

Whistleblowing

Whistleblowing is the reporting of potential or actual wrongdoing, and there is a legal obligation for Post Office to address the concerns and to protect whistleblowers. Due to the nature of our branch network, Post Office recognises that in some cases Postmasters, Agent Assistants and members of the public may be best placed to identify wrongdoing

Whistleblowing is normally reported to the Whistleblowing Officer, either directly or via the “Speak Up” Line. However, whistleblowing can be reported via other communication methods into different parts of the business, i.e. Customer complaints, calls to NBSC and Grapevine. These may be verbal or written communications. This guidance is designed to provide further understanding to front line teams and help differentiate between complaints and whistleblowing, and ensure that any potential whistleblowing reports are correctly communicated to the Whistleblowing Officer.

What is whistleblowing?

"Whistleblowing" refers to the act of exposing potential or actual wrongdoing and/or dangerous practices by reporting it either internally within an organisation, or externally, for example to a regulator.

Individuals should raise a concern if they are aware of, or suspect, wrongdoing which affects others (e.g. customers, members of the public, colleagues or the Post Office). Some examples (this is a non-exhaustive list) of situations where an individual may raise a concern are:

- Financial Crime including Fraud, Money Laundering and financing of terrorism,
- Giving, offering or taking of bribes,
- Financial mismanagement,
- Misreporting,
- Practices that could put individuals or the environment at risk,
- Breach of Post Office internal policies and procedures (including the Code of Business Standards),
- Concerns about slavery or human trafficking, and
- Any conduct likely to damage Post Office's reputation.

Who is protected by law

Certain protections are provided for whistleblowers by law. Within Post Office this includes:

- an employee, such as back office, Directly Managed Branch employees
- a trainee, such as a graduate employed by Post Office
- an agency worker

In order to encourage reporting of wrongdoing, Post Office will seek to provide equivalent protection to Postmasters, Agent Assistants, and Members of the public.

What a whistleblower should expect?

A whistleblower has the right to raise their concerns anonymously, if they wish to do so. However, not providing details may reduce Post Office's ability to undertake a thorough investigation into the concerns raised.

Even if details are provided, a whistleblower can still ask to remain anonymous. Post Office Ltd has a legal obligation to make every effort to protect the individual's identity.

Post Office Ltd is required to listen to all concerns raised and decide on the necessary actions. Post Office Ltd can keep the whistleblower informed about the actions taken, but can limit this information in order to keep the confidence of other people.

How to raise a concern

There are a number of options for colleagues to report wrongdoing. In the first instance, individuals should raise their concerns with their line manager or with a senior HR manager. Additionally, colleagues can contact:

- **The Whistleblowing Officer** – This is Post Office's General Counsel, currently Jane MacLeod who can be contacted on: [GRO](#) or [HYPERLINK "mailto:[GRO](#)"]
- The **"Speak Up"** Line – this service is available on [GRO](#) or via a secure on-line web portal [HYPERLINK "http://www.intouchfeedback.com/postoffice"].

Post Office also monitors other communication channels such as the Executive Correspondence Team and Grapevine.

All whistleblowing cases should be treated as highly sensitive and only discussed with the Whistleblowing Officer and those working with the Officer to address the concerns.

What to do

All whistleblowing reports should be passed to the Whistleblowing Officer, preferably via email. The Whistleblowing Officer will carry out an initial assessment of the issue to determine the scope of any investigation.

The Whistleblowing Officer will decide whether an investigation is appropriate and what form the investigation should take. The type of investigation will depend on the nature of the concern and may be:

- investigated internally
- resolved by agreed action as determined by the Whistleblowing Officer without an investigation
- referred to the police
- referred to a regulatory authority

If you are unsure as to whether a report is classified as whistleblowing, then you should refer to one of the following.

- The Whistleblowing Policy
- Your line Manager
- Whistleblowing Officer
- or the Financial Crime Team ([HYPERLINK "mailto:[GRO](#)"])

When is it whistleblowing?

Sometimes an individual believes they are blowing the whistle when, in fact, their complaint is a personal grievance. Individuals who make a disclosure under an organisation's whistleblowing policy should believe that they are acting in the public interest. This means in particular that personal grievances and complaints are not usually covered by whistleblowing law.

Note: Personal grievances (i.e. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your particular case is in the public interest.

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The following table demonstrates various scenarios, and whether or not it would be considered as whistleblowing.

Whistleblowing	Not Whistleblowing
An Assistant has seen the Postmaster process card payments with someone else's card and with no customer present.	An assistant has suspicions of a customer coming in to purchase large amounts of foreign currency on a regular basis.
A clerk has been selling Bureau de Change and taking a card payment. Then the customer gives the clerk cash as a personal payment for processing their transaction.	A clerk makes a mistake when processing a Bureau de Change sale. Initially processed as a card payment, but then cash payment taken.
Deliberately not checking customers ID where required and there is suspicions this may be linked to card fraud.	A newly hired clerk forgets to ask the customer for their ID.
A customer sends high value parcels on a regular basis. They suspect that an assistant is stealing the parcel, as parcels do not reach the destination when processed by this assistant.	A customer sends a high value parcel but it is never received by the recipient.
A clerk believes that a branch manager is using their knowledge of personal customer information to set up fraudulent accounts.	A customer has received Post Office Money correspondence to their home but addressed to another individual.
A customer reports that the branch is not opened as listed on the website, and whilst closed they can be seen processing transactions for other people.	A customer complains that a branch is opened for hours different than those stated on the Post Office website.
A clerk complains that the branch manager has made racist/discriminatory remarks to other members of staff and members of the public.	A clerk complains that they feel they are being bullied by their branch manager.